

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	Case No. 16-13061
	)	
John J. Pappas, Sr.	)	Chapter 11
	)	
	)	Judge Pamela S. Hollis

**FIRST AND FINAL FEE APPLICATION OF SPECIAL COUNSEL FOR DEBTOR FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES**

**Cover Sheet for Application for Professional Compensation**

**Name of Applicant(s):** Eric L. Schulman, Joshua M. Jackson and the firm of Schiller, DuCanto & Fleck

**Authorized to Provide Professional Services to:** Debtor, John J. Pappas, Sr.

**Date of Order Authorizing Employment:** October 6, 2016

**Period for which Compensation is Sought:** October 10, 2016 through August 20, 2018

**Amount of Fees Sought:** \$ 64,065.50

**Amount of Expense Reimbursement Sought:** \$ 1,755.07

**This is an:** Interim Application      Final Application   X  

**If this is not the first application filed herein by this professional, disclosure as to all prior fee applications:**

<b>Date Filed</b>	<b>Period Covered</b>	<b>Total Requested</b>	<b>Total Allowed</b>	<b>Any Amount Withheld by Order</b>
N/A	N/A	N/A	N/A	N/A

**The amount of fees and expenses paid to the Applicant to date for Service rendered and expenses incurred herein is: \$     -0-    .**

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**NOTICE OF FIRST AND FINAL FEE APPLICATION OF SPECIAL COUNSEL  
FOR DEBTOR FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES**

TO: **See Attached Service List**

Please take notice that on the **24<sup>th</sup> day of January, 2019 at 10:00 a.m.**, Richard G. Larsen of the firm of Springer Brown, LLC shall appear before the **Honorable Judge Pamela S. Hollis**, or any judge sitting in her stead, **Courtroom 644, 219 S. Dearborn Street, Chicago, IL 60604**, and present Debtor's *First and Final Fee Application of Special Counsel for Debtor For Allowance of Compensation and Reimbursement of Expenses*.

/s/ Richard G. Larsen /s/  
One of the Attorneys

Richard G. Larsen  
Springer Brown, LLC  
300 S. County Farm Road  
Suite I  
Wheaton, IL 60187  
630-510-0000

**CERTIFICATE OF SERVICE**

I, the undersigned, an attorney, hereby state that pursuant to the Administrative Procedures for the Case Management/Electronic Case Filing System, I caused a copy of the foregoing NOTICE and MOTION to be served on all persons set forth on the attached Service List identified as Registrants through the Court's Electronic Notice for Registrants and, as to all other persons on the attached Service List by mailing a copy of same in an envelope properly addressed and with postage fully prepaid and by depositing same in the U.S. Mail, Wheaton, Illinois on or before this **3<sup>rd</sup> day of January, 2019**.

/s/ Richard G. Larsen /s/

**SERVICE LIST**

**ECF Service:**

Patrick S. Layng  
Office of the U.S. Trustee, Region 11  
219 S. Dearborn St., Room 873  
Chicago, IL 60604

David K Welch  
Brian P. Welch  
Burke, Warren, MacKay & Serritella, P.C.  
330 N. Wabash, 21st Floor  
Chicago, IL 60611

**U.S. Mail Service:**

John J. Pappas, Sr.  
23 W. County Line Rd.  
Barrington Hills, IL 60010

Katherine B. Pappas  
1420 W. Belle Plaine, Unit  
1W  
Chicago, IL 60613

Department of the  
Treasury  
Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101

Internal Revenue Service  
Mail Stop 5014CHI  
230 S. Dearborn St., Room  
2600  
Chicago, IL 60604

JPMorgan Chase Bank,  
N.A.  
Attn: Correspondence Mail  
700 Kansas Lane; Mail  
Code LA4-555  
Monroe, LA 71203

Ocwen Loan Servicing,  
LLC as servicer HSBC  
c/o Codilis & Associates  
15W030 N. Frontage  
Road, Ste. 100  
Burr Ridge, IL 60527

Alyssa Mogul, Esq.  
Grund & Leavitt PC  
812 N. Dearborn St.  
Chicago, IL 60610

Ashley Funding Services,  
LLC its  
Successors assigns of  
Laboratory  
Corporation of America  
Holdings  
Resurgent Capital Services  
P.O. Box 10587  
Greenville, SC 29603

Brandon Freud  
Ruff Freud Breem &  
Nelson  
200 N. LaSalle St., Suite  
2020  
Chicago, IL 60601

Capital One NA  
c/o Becket and Lee LLP  
P.O. Box 3001  
Malvern, PA 19355

Chase Freedom  
P.O. Box 15153  
Wilmington, DE 19886

Internal Revenue Service  
Centralized Insolvency  
Operations  
P.O. Box 7346  
Philadelphia, PA 19101

HSBC Bank National  
Association, as Trustee  
c/o Ocwen Loan Servicing,  
LLC  
Attn: Bankruptcy Dept.  
P.O. Box 24605  
West Palm Beach, FL  
33416

Home Depot-Citibank  
P.O. Box 790328  
Saint Louis, MO 63179

J&B Mechanical, Inc.  
128 West Pratt Blvd.  
Schaumburg, IL 60172

JPMorgan Chase Bank,  
N.A.  
c/o Heavner, Beyers &  
Mihlar, LLC  
P.O. Box 740  
Decatur, IL 62525

JPMorgan Chase Bank,  
N.A.  
P.O. Box 29505 AZ1-1191  
Phoenix, AZ 85038

Katherine B. Pappas  
c/o Carrie A. Zuniga  
420 W. Clayton St.  
Waukegan, IL 60085

Lawrence M. Benjamin  
Reed Smith LLP  
10 S. Wacker Dr.  
Chicago, IL 60606

Mazda Capital Services  
P.O. Box 78074  
Phoenix, AZ 85062

Nordstrom Bank Visa  
P.O. Box 79137  
Phoenix, AZ 85062

PNC Bank, N.A.  
P.O. Box 94982  
Cleveland, OH 44101

PNC Bank  
2739 Liberty Ave.  
Pittsburgh, PA 15222

Pappas & Healy, LLC  
221 N. LaSalle St., Ste.  
5400  
Chicago, IL 60601

Sears MasterCard  
P.O. Box 9001055  
Louisville, KY 40290

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**FIRST AND FINAL FEE APPLICATION OF SPECIAL COUNSEL FOR DEBTOR FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Eric L. Schulman, Joshua M. Jackson and the firm of Schiller, DuCanto & Fleck (the “Applicant”), special counsel for the Debtor, through their attorneys, Springer Brown, LLC, pursuant to Section 330 and 331 of the Bankruptcy Code, 11 U. S. C. 101 et seq.(the “Code”), hereby applies to the Court for an order allowing compensation for professional services rendered and reimbursement of expenses incurred during the period of October 10, 2016 to September 20, 2018. In support hereof, the Applicant states as follows:

**INTRODUCTION**

1. The Debtor filed its petition for relief under Chapter 11 of the United States Bankruptcy Code (the “Code”) on April 18, 2016 under 11 U.S.C. §101 *et. seq.*
2. The Debtor was authorized to employ Eric L. Schulman and the firm of Schiller, DuCanto & Fleck, as its special counsel on October 6, 2016 with any compensation to be approved by the Court upon application of the applicant.
3. The Applicant seeks herein allowance of compensation and reimbursement of expenses of the period of October 10, 2016 to August 20, 2018 (the “Period”) and is the first application by special counsel for the Debtor. The engagement agreement is attached as **Exhibit “A”**. Applicants devoted **178.30 hours** of legal services and therefore requests compensation in

the amount of **\$64,065.50**, plus reimbursement of ordinary and necessary expenses for the same period incurred in connection therewith in the amount of **\$1,755.07**. In accordance with the engagement agreement, a complete description of the services and summary of time and services and expenses is attached as ***Exhibit "B"***.

4. All services for which compensation is requested by your applicant were performed for or on behalf of said debtor in possession, and not on behalf of any committee, creditor or other person. Said services are assumed to be reasonable, necessary and appropriate given that no objection was received in accordance with paragraph 6A of said engagement agreement.

#### **NARRATIVE SUMMARY OF SERVICES RENDERED**

5. Applicant was employed for the limited purpose of representing the debtor with respect to post-dissolution of marriage proceedings involving the debtor's ex-spouse Katherine B. Pappas. Because the post-dissolution proceedings involved the modification and payment of maintenance, the proceeding had a direct impact on the estate and creditors. Because applicant's services and engagement was confined to one task, there is not a division of tasks into categories for this application.

#### **EXPENSES**

6. During the Period, the Applicant incurred in expenses necessary to its representation of the Debtors. The amount requested for expenses, which are summarized on ***Exhibit "B"*** are for actual and necessary expenses incurred.

#### **LEGAL STANDARD**

7. Section 330 of the Code governs the allowability of fees and expenses for professionals employed in a bankruptcy case. Generally, professionals are entitled to (1)

“reasonable compensation for actual, necessary services rendered...” and (2) “reimbursement for actual, necessary expenses.” 11 U.S.C. Section 330.

8. All of the services rendered by Applicant were performed by Schiller, DuCanto & Fleck and the individuals identified in the time records. Time records for such services are maintained on a contemporaneous basis, and are subsequently reviewed to eliminate apparently unproductive or insufficiently documented time charges. Time is recorded on a tenth-of-an-hour basis. Therefore, the charges for which compensation is sought represent actually spent, “hard-core” time devoted to this case.

9. The compensation rates charged by Counsel are comparable to those charged by other practitioners of similar standing, skill and experience in cases of equal complexity.

10. The services rendered by Applicant were necessary services that have benefited this estate by providing funds to distribute to creditors and enabling the Debtor in Possession to perform his statutory duties. The expenses incurred by Applicant were necessary expenses that substantially contributed to the recovery of the funds now comprising the estate.

11. Based upon the nature, extent and value of the services performed by Applicant and the cost of comparable services other than in a case under this Title, the reasonable compensation for such services is **\$64,065.50**.

12. The Applicant incurred in expenses during the Period. This amount represents actual expenses incurred, which were necessary to the Applicant’s representation of the Debtors.

13. At all times while employed as special counsel for the Debtor, applicant was a disinterested person, neither representing nor holding an interest adverse to the interest of this estate with respect to the matters on which Applicant was employed.

Wherefore, the Applicant prays that an allowance be made in the sum of **\$64,065.50** against which should be applied the sum of \$20,000.00 previously paid upon the employment of Applicant on account as compensation for professional services rendered and that an allowance and authorization for payment be made in the sum of **\$1,755.07** for reimbursement for actual and necessary costs and expenses incurred in this proceeding. The balance of **\$44,065.50** plus expenses of **\$1,755.07**, for a total of **\$45,820.57** be payable immediately as an administrative expense in this case, and granting such other and further relief as this court deems just and proper in this proceeding.

/s/ Richard G. Larsen  
Attorney for Applicants

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Springer Brown, LLC  
300 S. County Farm Rd., Ste. I  
Wheaton, Ill. 60187  
630-510-0000  
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